

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

Michael Warren # 1182015  
(Full Name) (Register No.)

Plaintiff(s).

15-3332-CV-S-BP-P  
No.

Ron Long  
Tulaski County Sheriff's Office  
(Full Name)  
Officers Bryan, Elliot, Barbraant

Defendant(s).

COMPLAINT UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): Ozark Correctional Center  
929 Honor Camp Lane, Fordland, MO 65652

II. Parties to this civil action:

Please give your commitment name and any other name(s) you have used while incarcerated.

A. Plaintiff: Michael Warren Register No. #1182015  
Address: 929 Honor Camp Lane, Fordland, MO 65652

B. Defendant Ron Long  
Tulaski County Sheriff's Department, Jail Division  
is employed as Tulaski County Sheriff  
at 301 Route 66 #136, Kennettville, MO 65583

For additional plaintiffs or defendants, provide above information in same format on a separate page.

- III. Do your claims involve medical treatment? Yes ☒ No ☐
- IV. Do you request a jury trial? Yes ☒ No ☐
- V. Do you request money damages? Yes ☒ No ☐

State the amount claimed. \$ 15,000 / 25,000 (actual/punitive)

- VI. Are the wrongs alleged in your complaint continuing to occur? Yes ☐ No ☒

VII. Grievance procedures:

- A. Does your institution have an administrative or grievance procedure?

Yes ☒ No ☐

- B. Have the claims in this case been presented through an administrative or grievance procedure within the institution? Yes ☒ No ☐

- C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

Plaintiff Filed a grievance while Incarcerated At the Polaski County Jail, on 3-22-15. Yet Plaintiff's Grievance was never responded to. Plaintiff was told the Sheriff would handle it.

- D. If you have not filed a grievance, state the reasons.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

VIII. Previous civil actions:

- A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case? Yes ☐ No ☒

- B. Have you begun other cases in state or federal courts relating to the conditions of or your treatment while in confinement? Yes ☐ No ☒

- C. If your answer is "yes," to either of the above questions, provide the following information for each case.

(1) Style: \_\_\_\_\_  
(Plaintiff) (v.) (Defendant)

(2) Date filed: \_\_\_\_\_

(3) Court where filed: \_\_\_\_\_

(4) Case number and citation: \_\_\_\_\_

(5) Basic claim made: \_\_\_\_\_

(6) Date of disposition: \_\_\_\_\_

(7) Disposition: \_\_\_\_\_  
[(pending) (on appeal) (resolved)]

(8) If resolved, state whether for: \_\_\_\_\_  
[(plaintiff) or (defendant)]

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

On or about 3-22-15 Plaintiff was placed into confinement at The Polk County Jail. Upon being placed in his cell an altercation happened with another offender (Gedemah Jennings) at that time Deputy Elliot told me to get my things and she moved me to another Pod.

On or about 3-21-15 I was at Deck and had a medical emergency. When Mr. Burkhardt (Deputy) took me out of Deck to take me up front to wait on the EMTs. All the cells in the Dayroom she took Plaintiff through were open. There was a no-contact order placed on

- B. State briefly your legal theory or cite appropriate authority: See Exhibit A-IX A.

The Rights regarding offenders safety is clearly printed in The Rules and Regulations surrounding Jail and Jailers. The Plaintiff was placed in harms way by the officers misconduct.

- X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments

*Plaintiff wants the Court to find The Alaska County Sheriff and the officers were negligent in their job duties. As a result caused physical harm to be done to Plaintiff*

XI: Counsel:

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name.

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes ☐ No ☒

If so, state the name(s) and address(es) of each lawyer contacted.

If not, state your reasons.

*Cannot afford legal counsel*

- C. Have you previously had a lawyer representing you in a civil action in this court? Yes ☐ No ☒

If so, state the lawyer's name and address:

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this 3 day of July, 2015.

*Michael Warren*

(Signature(s) of Plaintiff(s))

Continued:

Mr. Jeremiah Jennings and the Plaintiff. However Deputy Barbrandt walked Plaintiff through the Dayroom where Jennings was not secured First. As the Plaintiff was being escorted by Deputy Barbrandt the Plaintiff was attacked by offenders (Jeremiah Jennings) and another offender by the name of Dominic which threw a cup of liquid in Plaintiff's Face and Eyes to start the Attack. Deputy Barbrandt sprays mace on all offenders to try and stop the attack however that fails. Then shortly later the Attack stops and Plaintiff was placed in a cell by himself. The Plaintiff filed a statement regarding the Fight.

As well as a grievance for the Jailers not following proper procedure for protocol on no-contact offenders.

Willie Mae Warren 118200  
Back Lane Center  
129 Haver Camp Lane  
Dorland Mo. 65652  
1430-231-004

U.S. DIST. COURT  
W. DIST. OF MO.  
KANSAS CITY, MO.



Charles D. Hyer  
United States District Court  
Western District of Missouri  
Kansas City, Mo. 64106

Legal Mail